

## KRIEGER LEWIN LLP

350 Fifth Avenue, 77<sup>th</sup> Floor  
 New York, NY 10118  
 Telephone: (212) 390-9550  
[www.KriegerLewin.com](http://www.KriegerLewin.com)

Nicholas J. Lewin  
 Direct Dial: (212) 390-9559  
[Nick.Lewin@KriegerLewin.com](mailto:Nick.Lewin@KriegerLewin.com)

November 13, 2024

By ECF

The Honorable Lorna G. Schofield  
 United States District Judge  
 Southern District of New York  
 40 Foley Square  
 New York, New York 10007

***Re:     United States v. Sue Mi Terry, 24 Cr. 427 (LGS)***

Dear Judge Schofield:

We represent Dr. Sue Mi Terry in the above-captioned proceeding. We write pursuant to the Court's October 28, 2024 Order, Dkt. No. 22, that the parties jointly propose a briefing schedule for pretrial motions. Accordingly, the parties propose the following schedule:

- Government's deadline to produce classified discovery: November 15, 2024
- Defendant's motion for a bill of particulars: December 4, 2024
  - Government's opposition: December 26, 2024
  - Defendant's reply: January 3, 2024
- Defendant's motion to dismiss the Indictment: February 5, 2025
  - Government's opposition: February 26, 2025
  - Defendant's reply: March 5, 2025
- Defendant's motion(s) to suppress and any other Rule 12(b)(3) motion(s): March 12, 2025
  - Government's opposition: April 2, 2025
  - Defendant's reply: April 9, 2025
- Government's CIPA Section 4 submission: April 15, 2025

Additionally, the parties each respectfully request an ex-parte CIPA Section 2 conference at the Court's convenience.

November 13, 2024

Page 2 of 2

We are available should the Court require any additional information or have any further questions.

Respectfully submitted,

By: \_\_\_\_\_ /s/  
Nicholas J. Lewin  
Melissa C. Danzo  
KRIEGER LEWIN LLP

Lee S. Wolosky  
JENNER & BLOCK LLP

Faith E. Gay  
Temidayo Aganga-Williams  
Joshua W. Bean  
SELENDY GAY PLLC

cc: All counsel of record (via ECF)

All defense motions shall be filed together with a single memorandum of law. The memoranda of law by Defendant and the Government each shall be limited to 30 pages. Defendant's reply brief shall be limited to 15 pages. The total briefing schedule shall not exceed 60 days from the filing of the motions to the filing of the reply brief. By November 20, 2024, the parties shall propose a briefing schedule for the same as well as a date for the Government's CIPA submission.

SO ORDERED.

Dated: November 15, 2024  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE